

**VETERINARY MEDICAL BOARD**  
**INITIAL STATEMENT OF REASONS**

**Hearing Date:** January 16, 2007

**Subject Matter of Proposed Regulations:** Clarify the date of publication used for internship and residency approval and update eligibility requirements for registered veterinary technician (RVT) licensing examination.

**Section(s) Affected:** 2021(g), 2067, 2068, 2068.5, 2068.6

**Specific Purpose of each adoption, amendment, or repeal:**

The specific purpose of this regulatory proposal is to amend existing regulations to 1) clarify the requirements for approval as an internship/residency veterinary training hospital and 2) to delete out of date and unnecessary eligibility categories and clarify the directed clinical experience requirements for the RVT licensing examination.

**Section 2021(g)**

**Amend Section 2021(g)**

The specific purpose of this regulatory proposal is to amend an existing regulation relating to the date of the publication used by the California Veterinary Medical Association in approving veterinary hospitals as internship/residency training hospitals.

**Section 2067**

**Repeal Section 2067**

The specific purpose of this regulatory proposal is to repeal an existing regulation that has been determined to not be equivalent to a "two year curriculum in veterinary technology" as determined by the Board as per Business and Professions Code, Section 4841.5.

**Section 2068**

**Repeal Section 2068**

The specific purpose of this regulatory proposal is to repeal an existing regulation that has been determined to not be equivalent to a "two year curriculum in veterinary technology" as determined by the Board as per Business and Professions Code, Section 4841.5.

**Section 2068.5**

**Amend Section 2068.5**

The specific purpose of this regulatory proposal is to amend an existing regulation to clarify the practical experience requirements for the RVT licensing examination and to make the required hours consistent with the definition of "full time" as per CCR, Section 2021(a).

**Section 2068.6**

**Amend Section 2068.6**

The specific purpose of this regulatory proposal is to amend an existing regulation to clarify the practical experience requirements for the RVT licensing examination and to make the required hours consistent with the definition of "full time" as per CCR, Section 2021(a).

## **Factual Basis/Rationale**

### **Section 2021(g)**

The California Veterinary Medical Association (CVMA) is the agency recognized by law in Section 2021 as the approval body for veterinary hospitals seeking certification as internship/residency training hospitals. The CVMA made minor clerical changes to the publication used to provide interested parties with information on the approval process; therefore, the date of the publication needs to be updated in the regulation.

### **Section 2067**

Section 2067 specifies that persons who graduate from a two-year curriculum in animal health technology that is not accredited by the American Veterinary Medical Association, Registered Veterinary Technician Committee or otherwise approved by the board and who have 18 months of non-specific practical experience are eligible to sit for the California RVT state licensing examination.

At its meetings on July 2006, October 2006, January 2007, May 2007, and July 2007, the RVT Committee put the discussion on this category on its public meeting agenda and sought input. The issue was submitted to the Veterinary Medical Board for its October 16, 2007, public meeting for discussion with a recommendation that the section be repealed as out of date and unnecessary. The existing language for Section 2067 does not address any of the specific education requirements for RVT job tasks nor does it outline requirements for the clinical practice experience. At its October 2007 meeting, the Board concurred with the recommendations to repeal this section and voted to schedule a public regulatory hearing. Persons who would have previously qualified under this section can now apply under Section 2068.5 provided they meet the specific parameters required for education and directed clinical experience.

### **Section 2068**

Section 2068 specifies that persons who receives a Bachelor of Science degree in a field or major related to animal health technology, including but not limited to animal husbandry, biology, chemistry, or biochemistry shall obtain a minimum of twelve (12) months of practical experience under the direct supervision of a licensed veterinarian who shall attest to the completion of that experience at the time application is made to the board for registration to be eligible for the registered veterinary technician examination.

At its meetings on July 2006, October 2006, January 2007, May 2007, and July 2007, the RVT Committee put the discussion on this category on its public meeting agenda and sought input. The issue was submitted to the Veterinary Medical Board for its October 16, 2007, public meeting for discussion with a recommendation that the section be repealed as out of date and unnecessary. The existing language for Section 2068 does not address any of the specific education requirements for RVT job tasks nor does it outline requirements for the clinical practice experience. At its October 2007 meeting, the Board concurred with the recommendations to repeal this section and voted to schedule a public regulatory hearing. Persons who would have previously qualified under this section can now apply under Section 2068.5 provided they meet the specific parameters required for education and directed clinical experience.

### **Section 2068.5**

Section 2068.5 outlines the eligibility requirements whereby candidates for the RVT licensing examination can obtain a specific amount of education and practical experience. The changes in this regulatory proposal clarify that the experience is to be directed by the supervising veterinarian and that the required twenty-four (24) months or 2944 hours of full time directed clinical experience is consistent with the existing definition of "full time" in Section 2021(a).

### **Section 2068.6**

Section 2068.5 outlines the eligibility requirements whereby candidates for the RVT licensing examination can obtain a specific amount of education and practical experience. The changes in this regulatory proposal clarify that the experience is to be directed by the supervising veterinarian and that the required twenty-four (24) months or 2944 hours of full time directed clinical experience is consistent with the existing definition of "full time" in Section 2021(a).

## **Underlying Data**

RVT Committee meeting minutes, April 2006 – October 2007

Veterinary Medical Board meeting minutes, April 2006 – October 2007

Letter from the California Veterinary Medical Association re: Update to Internship/Residency Requirements Booklet, dated April 10, 2007.

## **Business Impact**

This regulation will not have a significant adverse economic impact on businesses because it does not increase or add any additional requirements for eligibility.

## **Specific Technologies or Equipment**

This regulation does not mandate the use of specific technologies or equipment.

## **Consideration of Alternatives**

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.